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10 **UNITED STATES DISTRICT COURT**  
11 **FOR THE DISTRICT OF NEVADA**

12 UNITED STATES OF AMERICA, ) Case No.: 2:19-CR-00300-JCM-EJY  
13 Plaintiff, )  
14 )  
15 vs. ) **STIPULATION TO CONTINUE**  
16 ) **SENTENCING HEARING**  
17 ) (Fourth Request)  
18 )  
19 )  
20 JORGE SAENZ DE TEJADA, )  
21 Defendant. )  
22 \_\_\_\_\_ )  
23 )  
24 )

12 IT IS HEREBY STIPULATED AND AGREED by and between, Robert M. Draskovich,  
13 Esq., attorney for Defendant, Jorge Saenz De Tejada, and Christopher Chiou, United States  
14 Attorney, District of Nevada, Simon F. Kung, Assistant United States Attorney, that the  
15 sentencing hearing in the above captioned case, which is currently scheduled for November 10,  
16 2021 at 10:00AM., be continued and reset to a date and time convenient to the Court, but no  
17 sooner than ninety (90) days.

18 The Stipulation is being entered for the following reasons:

19 1. Based on the public health emergency brought by the COVID-19 pandemic, and the  
20 required social-distancing measures as recognized in the Court's Temporary General  
21 order 2020-05 Extended, the parties agree to continue the currently scheduled sentencing  
22 hearing from November 10, 2021 at 10:00AM., to a date and time convenient to the  
23 Court, but no sooner than ninety (90) days.  
24 2. This continuance allows counsel additional time to prepare for the hearing.

3. This continuance is not sought for purposes of delay, but to account for the necessary social-distancing in light of COVID-19 public health emergency.
4. The defendant is out of custody and does not object to the continuance.

RESPECTFULLY SUBMITTED this 5<sup>th</sup> day of November, 2021.

/s/ Simon F. Kung  
SIMON F. KUNG  
Assistant United States Attorney  
Attorney for Plaintiff

/s/ Robert M. Draskovich  
ROBERT M. DRASKOVICH, ESQ.  
Nevada Bar No. 6275  
Attorney for Defendant

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Based on the pending stipulation between the government and the defense, and good cause appearing therefore, the Court hereby finds that:

1. To account for the necessary social-distancing in light of the COVID-19 public health emergency, the sentencing hearing in this case should be continued.
2. The parties agree to this continuance.
3. This continuance allows counsel additional time to prepare for the hearing.
4. This continuance is not sought for purposes of delay.

## ORDER

**IT IS THEREFORE ORDERED** that the sentencing hearing in the above-captioned matter currently scheduled for November 10, 2021 at 10:00AM., be vacated and continued to a date and time convenient to this Court, that is February 23, 2022 at the hour of 10:00 a.m. .

**IT IS SO ORDERED** November 5, 2021.

UNITED STATES DISTRICT JUDGE